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One North Capitol, Suite 700  
Indianapolis, Indiana 46204  
Tel 317.232.8800  
Fax 317.232.4146  
[www.AccelerateIndiana.com](http://www.AccelerateIndiana.com)

Barbara McNutt  
Chief Counsel  
Indiana Professional Licensing Agency

Dear Ms. McNutt:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small businesses associated with rule changes proposed by the Indiana Professional Licensing Agency ("IPLA") on behalf of the Indiana Real Estate Commission ("Commission") and contained in LSA Document 08-357. The proposed rule amends 876 IAC 3-5-1.5 to eliminate a requirement for four hours of a real estate appraiser's continuing education contained in certain Indiana statutes and rules regarding the practice of real estate appraising. The rule also repeals 876 IAC 3-5-6.1 concerning required instructional materials in such a course. Finally, the rule makes corresponding amendments to 876 IAC 3-2-4 and other sections of 876 IAC 3-5.

There are 1,094 Certified Residential Appraisers, 674 Certified General Appraisers, 566 Licensed Real Estate Appraisers, and 48 Trainee Appraisers that may be affected by the rule. The IPLA does not have the information necessary to determine how many of these licensees are classified as, or are employed by, a small business as defined under IC 4-22-2-28.

The impact statement prepared by the IPLA indicates that because the rule only repeals existing requirements which the Commission deems unnecessary and makes clarifying change there is no economic impact to small business associated with the rule. The IEDC does not object to the economic impact to small businesses associated with the proposed rule.

If you have any questions about the comments contained herein please contact me at 233-8962 or [rasberry@iedc.in.gov](mailto:rasberry@iedc.in.gov).

Regards,

  
Ryan Asberry